

Exhibit E

SULLIVAN & CROMWELL LLP

125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL
SERVICES (LUXEMBOURG) S.A., as represented
by its Liquidator Hanspeter Kramer, *et al.*,

Defendants.

Adv. Pro. No. 12-01565 (SMB)

[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION TO STAY

WHEREAS, this cause having come before the Court on the motion of Defendants Standard Chartered Financial Services (Luxembourg) S.A., Standard Chartered Bank International (Americas) Ltd., and Standard Chartered International (USA) Ltd. (together, “SCB” or “Defendants”), by and through their counsel, Sullivan & Cromwell LLP, seeking entry of an order granting Defendants’ Motion to Stay;

WHEREAS, this Court, having considered the Memorandum of Law in Support of Defendants’ Motion to Stay, the Declaration of Andrew J. Finn in Support of Defendants’ Motion to Stay and accompanying exhibits, and any objections thereto;

WHEREAS, due notice of Defendants’ Motion to Stay having been given, and it appearing that no other or further notice need be given;

WHEREAS, the Court having determined that the legal and factual bases set forth in Defendants’ Motion to Stay establish just cause for the relief granted herein;

It is hereby

ORDERED, that Defendants’ Motion to Stay is granted and all proceedings in this case are stayed pending the Second Circuit’s decisions in *Picard v. Citibank, NA.*, No. 20-1333 (2d Cir.) and *Picard v. Legacy Capital Ltd.*, No. 20-1334 (2d Cir.).

Dated: _____, 2020,
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE